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DECLARATION OF SCOTT ACORD

I, Scott Acord, declare as follows:

- 1. I am the Vice President of Communications for VH1. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, unless stated herein as on information and belief, and if called as a witness, I could and would competently testify thereto.
- 2. Shed Media produces the *Basketball Wives* series, which airs on the VH1 network.
- 3. The series has been immensely popular. I am informed and believe, and on that basis declare, that more that 3.5 million people tuned into the premiere of *Basketball Wives 3* on May 30, 2011, more than 250,000 people follow the series on Twitter, and more than 350,000 people "like" the series on Facebook. A true and correct copy of a VH1 blog page reflecting a press release, created by VH1 in the ordinary course of its business, describing the ratings for the first episode of Basketball Wives 3 is attached hereto as EXHIBIT A. A true and correct copy of the Basketball Wives Facebook landing page is attached hereto as **EXHIBIT B.** A true and correct copy of the *Basketball Wives* Twitter feed landing page is attached hereto as EXHIBIT C.
- VH1 and Shed are responsible for the publicity of the series, and 4. I, as VH1's Vice President of Communications, oversee any such publicity on behalf of VH1. To date, there have been two press releases related to the Los Angeles Basketball Wives. There has been no other published official press releases by VHI. These press releases accurately describe the contents and general story line of the Show, and do not mention Gilbert J. Arenas, let alone describe Laura Govan as

his ex-girlfriend and the mother of his children. Instead, they describe the cast as follows: 2 3 "Basketball Wives LA" cast includes: Kimsha Artest (wife of Ron 4 5 Artest, Los Angeles Lakers), Gloria Govan (fiancée of Matt Barnes, 6 Los Angeles Lakers), Laura Govan (sister of Gloria Govan) and Jackie 7 Christie (wife of Doug Christie, former player for the Los Angeles 8 Clippers) and Imani Showalter (fiancée of Stephen Jackson, Charlotte 9 Bobcats) as well as others. 10 11 The newer press release reads: 12 13 VH1 GIVES A FULL COURT PRESS WITH "BASKETBALL WIVES LA" 14 15 "Basketball Wives LA" Premieres On VH1 Monday, August 29 at 16 17 8PM ET/PT 18 19 BEVERLY HILLS, CA – JULY 28, 2011 – VH1 is expanding their 'Basketball Wives' franchise with an explosive new series set in Los 20 21 Angeles which features the wives, girlfriends and exes to some of the 22 hottest players from the Los Angeles Lakers and other legendary 23 24 25 26 teams. Let the games begin on "Basketball Wives LA" premiering 27 Monday, August 29 at 8PM ET/PT on VH1. 28

Elbow throwing, trash talking and in-your-face action: forget the NBA, we're talking about their wives! The successful VH1 franchise "Basketball Wives" just tapped a new team of leading ladies to take Los Angeles by storm on VH1's "Basketball Wives LA" premiering Monday, August 29 at 8PM ET/PT. "Basketball Wives LA" introduces a group of dynamic women with relationships to some of the biggest basketball players in the game. "Basketball Wives LA" cast includes:

GLORIA GOVAN – fiancée of LA's Matt Barnes, Gloria may be fairly new to the West Coast, but not to viewers of Basketball Wives. After relocating to Los Angeles and surviving Barnes' first season playing for the most recognizable team in the world, she's keeping busy both as a mom to her twins and taking on a new challenge: easing into the Southern California lifestyle.

LAURA GOVAN – sister to Gloria Govan, Laura may be rebuilding her life with just her kids and brand new baby to keep her company, but she's never alone as Govan family ties run strong. Like her sister, Laura has no trouble speaking her mind or sticking up for family when things get rough.

KIMSHA ARTEST – self-described 'partner' of Ron Artest and mother of three, Kimsha is proud of her New York (Jamaica, Queens) roots and not a fan of living in Los Angeles. After seventeen years with

Artest, she's rolled with the punches when it comes to the basketball lifestyle. Kimsha refuses to resign herself to the LA "party" lifestyle, also shying away from the bling.

IMANI SHOWALTER – ex-fiancée to player Stephen Jackson and mother of three, Imani has fought hard against being stigmatized since parting ways with her famous ex and isn't shy to confess that she hasn't dated since. A former singer with a New York girl group, Imani says she's in the process of "rediscovering what makes me happy again... I want to find my passion and that's where I want to go."

MALAYSIA PARGO – wife of Chicago's Jannero Pargo, Malaysia grew up in Compton, California before meeting her husband at 22. On being a basketball wife, she confesses that she always has her guard up and that one has to be a strong individual in order to live this lifestyle because it will "swallow you up and spit you out."

JACKIE CHRISTIE – wife of retired player Doug Christie, Jackie claims to have the strongest marriage in basketball, and it shows: she and Doug renew their vows every year! Bulldozed in the press for being overbearing and controlling in her relationship, she's not one to hold her tongue, even with other players' wives. She loves the spotlight and seems unfazed by her reputation as a polarizing figure in the world of basketball wives.

DRAYA MICHELE – Draya is currently a model and aspiring actress in Los Angeles with several music videos and magazine covers to her credit. A controversial beauty with a history of dating players, the funny and engaging Draya says "I have a million haters. I open the list of haters and it rolls across the floor." No word yet if any of the new LA wives make that list.

This 10 episode, hour-long series will dive into the real-life locker room of these leading ladies, giving viewers a never-before-seen look at what it takes to live in La La Land and be connected to a famous professional athlete. For the most part, these women live the life with the best cars, biggest mansions and hottest bling but living the high life is not all glamour and often there is a price to pay. Cameras will follow these women as they attempt to juggle their relationships, infidelity issues, children and friendships while trying to find the perfect balance between supporting their families and realizing their own career ambitions. "Basketball Wives LA" brings a full court press to VH1 on

Shed Media is producing the series. Executive producers for Shed Media are Nick Emmerson, Alex Demyanenko, Jennifer O'Connell and Sean Rankine. Tom Huffman is a consulting producer. Shaunie O'Neal is an executive producer. Executive producers for VH1 are Jeff Olde, Jill Holmes and Noah Pollack.

Monday, August 29 at 8PM ET/PT.

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VH1 connects viewers to the music, artists and pop culture that matter 1 2 to them most with TV series, specials, live events, exclusive online 3 content and public affairs initiatives. VH1 is available in 99 million households in the U.S. VH1 also has an array of digital channels and 4 5 services including VH1Classic, VH1 Soul, VH1 Mobile, and extensive video on VH1.com. 6 7 8 Connect with VH1 at VH1.com. 9 ### 10 11 12 Contacts: 13 Basketball Wives LA: 14 15 Chris Delhomme Emily Robinson 16 17 18 310-752-8635 212-846-4223 19 Chris.Delhomme@vh1.com Emily.Robinson@vh1.com 20 21 22 Although neither of these releases mention Gilbert Arenas, it is possible that future 23 promotional materials could mention that Gilbert Arenas is Laura Govan's ex-24 boyfriend and the father or her children. A true and correct copy of the press 25 releases are attached hereto as EXHIBIT D. 26 27 I declare under penalty of perjury under the laws of the United States of 28 America that the foregoing is true and correct. W02-WEST:1VEA2\403768732.1 -6-

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